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# MONTANA CHAPTER

ASSOCIATED PUBLIC-SAFETY COMMUNICATIONS OFFICERS  
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**APR - 6 1993**

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20544

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

PR Docket No. 92-235

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**APR 5 1993**

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In the Matter of:  
Replacement of Part 90 by  
Part 88 to Revise the Private  
Land Mobile Radio Services and  
Modify the Policies Governing  
Them

To: The Commission

## COMMENTS OF: MONTANA CHAPTER APCO

Montana APCO supports the Commission's goals outlined under PR Docket 92-325. Efforts to increase spectrum are necessary. Attempts to increase the number of radio channels under the existing spectrum allocation is applauded. However, we have noted many areas of concern under this Proposal and have indicated some of our concerns and recommendations below:

1. Since current radio technology doesn't allow for use of 6.25khz channel spacing, we recommend a single stage approach to a 12.5khz channel plan that would allow for analog or digital modulation schemes. Public-Safety coordinators could begin assignment on new 12.5khz channels upon adoption of a band plan provided there is no interference to existing users in the 420-512mhz. band. In the 150-174mhz band, minor modifications may be made to conform to any new rechanneling plan afforded this band.
  - A. Manufactures currently market radios with this capability.
  - B. Interoperability can be maintained.
  - C. Orderly migration can be accomplished.

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2. We propose that digital standards and 6.25khz spacing be addressed after completion of APCO Project 25.

A. Forward and backward capability must be addressed to allow for interoperability and orderly migration to new technical standards under individual amortization schedules. A 20 year amortization plan following type acceptance of new equipment appears reasonable.

B. We recommend allocation of any newly created interleaved frequencies at 6.25khz. spacing be allocated to Public-

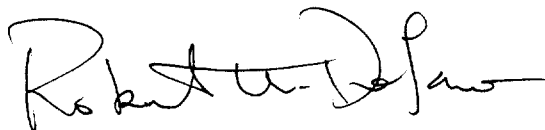
- A. Through computer analysis, the State of Montana has estimated- by using Part 88.429, table C-3 "HAAT" guidelines- that radio wave propagation in remote areas would be diminished to inoperable levels. The proposed five watt ERP levels at "HAAT" above 590 ft. would reduce coverage to levels that would require new development of up to as many as seven times as many sites to maintain existing coverage contours. In many cases, this would require reclassification of Federal Lands as Communications sites. This means that lengthening of the time for development is necessary. Performing environmental impact statements and development of rights-of-way have to be taken into account, not to mention the costs associated with the development of new sites. Eg: power, phone lines, buildings, etc. In many instances, additional frequencies would be needed, thereby, defeating the original purpose of the Docket in attempting to gain additional spectrum. In addition, reduction of power levels to those recommended would obsolete existing equipment because the existing equipment could no longer meet the type-acceptance required to operate.
5. We recommend removing the lower power restrictions on Part 88.909(f) as these frequencies are used on a "secondary" basis and are needed for FXO controls at higher power for wide-area linked systems. In sparse remote areas, phone lines and power for microwave systems is not available which leaves no other alternative but to link base stations through the use of these frequencies. Higher power levels-

7. Lottery of spectrum will never serve the best interest of Public-Safety users. Smaller users have need for spectrum as do large users. To remove their capability of direct access to spectrum or to require them to procure spectrum or systems through the "luck of the draw" will drive up costs for spectrum or frequencies. Only those with strong

In summary, Montana APCO supports the Commission's goal in simplifying the policies and procedures required for licensing. We commend the Commission in attempting to generate new spectrum through new standards. However, the financial impacts and timeliness of implementation of the regulations upon users should be of utmost concern. Protecting the interests of all Public-Safety users large or small should be considered. Accurate, timely coordination of license requests is essential. Allowing agencies and users sufficient time to amortize and replace equipment to newer technologies is needed.

Again, your concern for Public-Safety communications and our individual needs is appreciated. Thank you for allowing us to express our concerns in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert W. DeLange". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert W. DeLange-President  
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